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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CHRISTOPHER PETRAS,

Plaintiff,

v.

**NAVY FEDERAL CREDIT
UNION; JPMORGAN CHASE
BANK, NATIONAL
ASSOCIATION; EQUIFAX
INFORMATION SERVICES
LLC; AND, EXPERIAN
INFORMATION SOLUTIONS,
INC.**

Defendant.

Case No.: 20-cv-874-RFB-BNW

**STIPULATION AND [PROPOSED]
ORDER REGARDING
DEPOSITION OF MITCHELL
TAUBMAN, PH.D.**

HON. BRENDA WEKSLER

**TO THIS COURT AND TO ALL PARTIES AND THEIR RESPECTIVE
ATTORNEYS OF RECORD:**

WHEREAS, this Court issued its Scheduling Order on July 8, 2020, ECF No. 18;

WHEREAS, this Court extended said dates on October 14, 2020, ECF No. 37; December 11, 2020, ECF No. 52; and, April 30, 2021, ECF No. 63;

WHEREAS, the Parties will complete all discovery aside from the deposition of Plaintiff's expert Mitchell Taubman, Ph.D. by the current discovery deadline of June 7, 2021;

WHEREAS, the Parties previously agreed for Dr. Taubman to be deposed on June 4, 2021, and Experian noticed Dr. Taubman for the date of June 4, 2021;

WHEREAS, Dr. Taubman now has a conflict on June 4, 2021;

WHEREAS, the Parties have attempted to select a date for Dr. Taubman's deposition within the discovery cut off but have been unable to find a mutually agreeable date that works for all counsel and Dr. Taubman;

WHEREAS, the Parties jointly request this Court permit Defendants JPMORGAN CHASE BANK, NATIONAL ASSOCIATION ("Chase"); and, EXPERIAN INFORMATION SOLUTIONS, INC. ("Experian") to depose Dr. Taubman on June 8, 2021, after the close of discovery.

WHEREAS, the Parties do not seek to change any other dates in the operative Scheduling Order through this Stipulation nor is any additional discovery permitted after the current discovery cut-off, which the exception of Dr. Taubman's deposition.

1 Date: June 2, 2021

LOKER LAW, APC

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3 By: /s/ Matthew M. Loker
4 MATTHEW M. LOKER, ESQ.
5 ATTORNEY FOR PLAINTIFF

6 **NAYLOR & BRASTER**

7
8 By: /s/ Jennifer L. Braster
9 JENNIFER L. BRASTER, ESQ.
10 ATTORNEY FOR DEFENDANT, EXPERIAN

11 **BALLARD SPAHR LLP**

12 By: /s/ Joel E. Tasca
13 JOEL E. TASCAS, ESQ.
14 ATTORNEY FOR DEFENDANT, CHASE

15 **ORDER**

16 The above-set stipulated agreement to depose Mitchell Taubman, Ph.D. on
17 June 8, 2021 is granted.

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19 IT IS SO ORDERED:

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22 UNITED STATES MAGISTRATE JUDGE

23 DATED: June 4, 2021
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